



PATENT
17207-00003

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Samra et al. : Art Unit: 3623
Serial No.: 09/474,539 : Examiner: Andre D. Boyce
Filed: December 29, 1999 :
For: METHODS AND SYSTEMS :
FOR ANALYZING :
MARKETING CAMPAIGNS :
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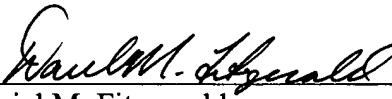
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I certify that the documents listed below:

- Issue Fee Transmittal (1 pg., in duplicate)
- Comments on Statement of Reasons for Allowance (2 pgs.)
- Formal Drawings Transmittal (1 pg.)
- Eight (8) Replacement Sheets of Formal Drawings
- Certificate of Express Mail (1 pg.)
- Return Post Card

are being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service under 37 C.F.R. §1.10 on the date indicated above in an envelope addressed to Mail Stop ISSUE FEE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

Respectfully submitted,



Daniel M. Fitzgerald
Registration No. 38,880
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, MO 63102-2740
(314) 621 - 5070



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COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE

Commissioner for Patents
 P.O. Box 1450
 Alexandria, VA 22313

Sir:

The following comments are in response to the Examiner's Statement of Reasons for Allowance in the Notice of Allowability dated July 12, 2005.

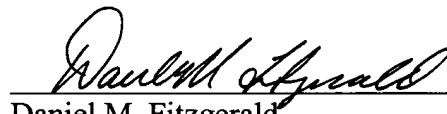
Applicants respectfully disagree with the Examiner's Statement of Reasons for Allowance because such statement may have unintentionally introduced some ambiguities in what was otherwise a very concise and thorough examination of the Claims of this patent application. The Examiner recites in the Reasons for Allowance what he believes is taught by references: Lee et al. US2002/0072951; Lazarus et al. US 6,430,539; and Thearling US6,240,411. Applicants respectfully submit that Applicants do not necessarily agree with what the Examiner has recited as to what is taught by these references. Rather, Applicants believe the record as a whole should be considered.

The Examiner further notes in the Reasons for Allowance that "with respect to independent claims 1 and 11, none of the prior art of record, taken individually or in any combination, teach inter alia, embedding within the targeting engine a plurality of analytic models including marketing and risk models, the marketing models including a net present value/profitability model, a prospect pool model, a net conversion model, an attrition model, a response model, a revolver model, a balance transfer model, and a reactivation model; using the targeting engine to determine a sequential order for combining the models; combining the

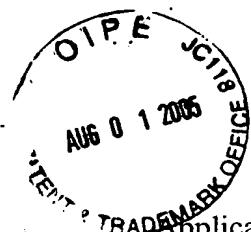
models embedded within the targeting engine in the determined sequential order to define an initial customer group including a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer.” While Applicants believe that the claims are allowable, Applicants do not acquiesce that patentability resides in these features recited in the Reasons for Allowance. Rather, Applicants respectfully submit that the claims are allowable because the independent claims recite the above-noted recitation in combination with other recitations included in the independent claims.

Also, reasons for allowance are only warranted in instances in which the record of the prosecution as a whole does not make clear the Examiner's reasons for allowing a claim or claims (see 37 CFR §1.104(e)). In the present case, Applicants believe the record as a whole does make the reasons for allowance clear and therefore no statement by the Examiner is necessary or warranted.

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St. Louis, Missouri 63102-2740
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TRANSMITTAL OF FORMAL DRAWINGS

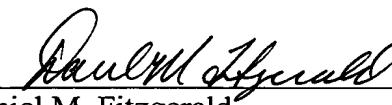
In response to the requirement for corrected drawings set forth in the Notice of Allowance dated July 12, 2005 for the above referenced patent application, enclosed are eight (8) Replacement Sheets of Formal Drawings, in compliance with 37CFR 1.84.

The Formal Drawings submitted herewith were originally submitted to the Patent Office on July 2, 2002 along with a Request for Approval of Drawing Changes. Applicants received approval of the Formal Drawings from the Patent Office through an Office Action dated September 16, 2002. Accordingly, the attached Formal Drawings have already been approved by the Patent Office.

The Replacement Sheets of Formal Drawings are submitted herewith in response to the Notice of Allowance.

No new matter has been added.

Respectfully submitted,


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